

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
 Aaron Smith, *on behalf of himself and others*  
*similarly situated in the proposed FLSA*  
*Collective Action,*

Case No.: 23-cv-3694

*Plaintiff,*

**~~PROPOSED~~ JUDGMENT**

*- against -*

Proguard Protection Inc., Robert Hall, and  
 Richard Stanley,

*Defendants.*

-----X  
 On December 14, 2023, Plaintiffs Aaron Smith, Tyishia Dudley, Colman Goncalvez, and Samuel Deadwyler (the “Plaintiffs”) filed a notice of acceptance of offer of judgment pursuant to Rule 68 of the Federal Rules of Civil Procedure;

NOW, it is hereby ORDERED, ADJUDGED AND DECREED that the Plaintiff has judgment against Defendants Proguard Protection Inc., Robert Hall, and Richard Stanley (the “Defendants”) in the amount of Seventy-Two Thousand Five Hundred Dollars and Zero Cents (\$72,500.00) (the “Judgment Amount”) which is inclusive of attorneys’ fees and costs and any other fees, costs, and/or disbursements.

This judgment is intended to resolve, in full satisfaction, all of Plaintiffs’ claims as alleged or which could have been alleged in the Complaint pertaining to this Action, including any damages Plaintiffs asserted or could have asserted in this Action, including but not limited to, any claims Plaintiffs may have for monetary damages, backpay, front pay, liquidated damages, penalties, and any fees, costs, and/or reasonable attorneys’ fees.

The payment amount shall be paid on or before a date within fourteen (14) days of the date of this Judgment.

It is further ordered that the conference scheduled for Friday, December 15, 2023, at 10:00 A.M. is CANCELED.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Date: December 14, 2023